

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

FIRST-CLASS MAIL AND PERIODICALS
SERVICE STANDARD CHANGES, 2021

Docket No. N2021-1

NATIONAL POSTAL POLICY COUNCIL
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS STEPHEN B. HAGENSTEIN (USPS-T-3)
(May 19, 2021)

The National Postal Policy Council ("NPPC"), pursuant to §3020.117 of the Commission's rules of practice, respectfully submits the following interrogatories, number (NPPC/USPS-T3-1 through 10) to United States Postal Service witness Stephen B. Hagenstein (USPS-T-3) and requests a timely answer under oath. If an interrogatory can be answered more accurately by a different witness, please redirect it to the appropriate witness.

Please contact the undersigned with any questions.

Respectfully submitted,

NATIONAL POSTAL POLICY COUNCIL

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NPPC/USPS-T3-1: Please refer to page 2, lines 1 through 3, of your testimony, where you state: “To illustrate, when mail volumes were increasing between 1993 and 2006, the Postal Service added processing and distribution facilities to the processing network.”

- a. Please provide counts of processing and distribution facilities by end of year from 1993 to 2021.
- b. Please provide current USPS estimate of these counts for the next five years, assuming implementation of the service standards changes in this proceeding.

NPPC/USPS-T3-2: Please refer to page 5, lines 12 through 16, of your testimony, where you state: “The Postal Service also contracts with third-party terminal handling suppliers which act as intermediaries between the Postal Service and the air transportation provider. These terminal handling suppliers prepare mail for air transport and receive mail from the air transportation provider for transfer to the Postal Service.”

- a. In general, into what cost segment and component are these costs booked?
- b. How much were those costs in FY 2020?

NPPC/USPS-T3-3: Are the workers who handle mail at Surface Transfer Centers USPS personnel?

- a. If so, what craft are they in?
- b. Are they tallied as part of IOCS?

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- c. Are their labor hours accounted for under MODS, NDCs, NonMODS or a combination of the three?
- d. Please provide the FY 2020 craft cost for the activities.

NPPC/USPS-T3-4: Please refer to page 3, lines 20 through 22, of your testimony, where you state: "The functional responsibility of PVS is to transport large containers of mail between mail processing facilities, and to and from airports, Post Offices, stations, and branches." Please describe the types of containers that are generally used.

NPPC/USPS-T3-5: How many total pieces of First-Class Letter Mail were transported between mail processing facilities in 2020? Please disaggregate by Single Piece, Non-Automation, Mixed AADC Automation, AADC Automation, and 5-Digit Automation. If you are unable to provide a count, please provide an approximation and describe its development.

NPPC/USPS-T3-6: Please refer to page 4, lines 6 through 9, of your testimony, where you state: "On average, HCR transportation is less expensive than PVS." Please provide the average cost of PVS used in your modeling.

NPPC/USPS-T3-7: For Highway Contract Routes, what is the current average capacity utilization of:

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- a. Short haul trips?
- b. Long haul trips?

NPPC/USPS-T3-8: Please provide the HCR average capacity utilization in your optimized case for:

- a. Short haul trips.
- b. Long haul trips.

NPPC/USPS-T3-9: Please refer to your library reference filed as USPS-LR-N2021-1/1 from April 21, 2021. Please provide data dictionaries for the file named 1_P.WEB_ODIN_MARCH_2019.txt.

NPPC/USPS-T3-10: Please refer to your library reference filed as USPS-LR-N2021-1/3. For the file named 3_SSD_5D_Vol_Impacts_CONUS.xlsx, tab "Marketing_Mail_Impact":

- a. Please confirm that cell C6 has a value of 946,863 pieces in the end to end network of a total of 206,590,998.
- b. Does the amount of marketing mail in the end to end First-Class Mail network change materially in the optimized case? If so, to what?